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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

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| In Re: | : | CHAPTER 13 |
| | : | CASE NUMBER: 19-31393 JNP |
| Lester Collins and Viola Collins | : | |
| | : | Honorable Jerrold N. Poslusny, Jr. |
| Debtor(s), | : | |
| | : | OBJECTION TO CLAIM OF US BANK |
| | : | TRUST N.A./BSI FINANCIAL SERVICES |

The Debtors, Lester Collins and Viola Collins, certifies as follows:

1. We own real property located at 17 Pershing Lane, Sicklerville, NJ 08081. US Bank Trust N.A. holds the first mortgage on our real property. BSI Financial Services services that loan.

2. We filed our present bankruptcy on November 13, 2019. We received a discharged in an earlier Chapter 13 case, 13-23605, filed on June 20, 2013. We fell behind in our post-petition payments in the prior case. The mortgage company filed a certification of default on May 2, 2018 at which time we owed \$18,190.66. While the Chapter 13 trustee filed a report showing she paid all our pre-petition arrears, we did have this substantial post-petition arrearage when we completed our plan and did not make any further mortgage payments for another 18 months, until we filed this present bankruptcy. Our total monthly mortgage payment at this time, including escrow, is \$1,327.91. We acknowledge that these missed payments total approximately \$42,000.00.

3. On or about January 7, 2020 US Bank Trust NA filed a Proof of Claim alleging 78,409.91 in arrears, consisting of principal and interest in the amount of \$25,402.62, pre-petition fees of \$17,562.49, funds advanced of \$32,590.47 and a projected escrow shortage of \$3,037.47. We object to the "pre-petition fees" totaling \$17,562.49 as those fees appear to include a "prior servicer escrow advance" of \$11,691.39 that was already calculated into the escrow advance portion of the claim.

4. We respectfully object to the Proof of Claim of US Bank Trust NA/BSI Financial Services and object to paying the claim in full. We respectfully request that this Court reduce the creditor's claim by \$11,691.39.

We hereby certify that the foregoing is true and correct.

DATED: 02/10/2020

/s/ Lester Collins
Lester Collins, Debtor

DATED: 02/10/2020

/s/ Viola Collins
Viola Collins, Debtor